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*Attorneys for Defendants Culinary Workers Union
Local 226*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LISA NIGRELLI, an individual,

Plaintiff,

vs.

VICTORIA PARTNERS d/b/a MONTE CARLO
RESORT AND CASINO, as the employer;
CULINARY WORKERS UNION, LOCAL 226;
and DOES 1-50, inclusive,

Defendants.

CASE NO. 2:15-cv-01840-GMN-NJK

**AFFIDAVIT OF KRISTIN L. MARTIN IN
SUPPORT OF LOCAL 226'S MOTION FOR
SUMMARY JUDGMENT**

I, Kristin L. Martin, declare:

1. I am counsel of record for Defendant Culinary Workers Union Local 226 in this matter. I am a member in good standing of the State Bar of Nevada. I have personal knowledge of the following facts and if called, could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of the First Amended Complaint.

3. Attached hereto as Exhibit B are true and correct copies of pages 1, 25-26, 50, 52, 61-63, 86-87, 89-90, 92-100, 110, 114, 118-119, 130, 136-137, 153-154, 162-163, 170-172, 182, 184, 189-

201, 203-205, 207, 211, 213-214, 218, 296-297 and 324 of the transcript of the deposition of Plaintiff Lisa Nigrelli.

4. Attached hereto as Exhibits C to L are true and correct copies of exhibits from the transcript of the deposition of Plaintiff Lisa Nigrelli as follows:

Exh. C -- Exhibit 2 to Nigrelli Deposition

Exh. D -- Exhibit 5 to Nigrelli Deposition

Exh. E -- Exhibit 7 to Nigrelli Deposition

Exh. F -- Exhibit 10 to Nigrelli Deposition

Exh. G -- Exhibit 11 to Nigrelli Deposition

Exh. H -- Exhibit 13 to Nigrelli Deposition

Exh. I -- Exhibit 14 to Nigrelli Deposition

Exh. J -- Exhibit 17 to Nigrelli Deposition

Exh. K -- Exhibit 18 to Nigrelli Deposition

Exh. L -- Exhibit 26 to Nigrelli Deposition

5. Attached hereto as Exhibit M are true and correct copies of pages 1, 16, 20-24, 26, 30-31, 34-35, 37-39, 41-43, 52-53, 66-69, 72-73, 79-82, 84-86, 92 and 111 of the transcript of the deposition of Nick Kabetso.


6. Attached hereto as Exhibits N to P are true and correct copies of exhibits from the transcript of the deposition of Nick Kabetso as follows:

Exh. N -- Exhibit 3 to Kabetso Deposition

Exh. O -- Exhibit 4 to Kabetso Deposition

Exh. P -- Exhibit 11 to Kabetso Deposition

I declare under the penalty of perjury of the laws of the United States and the State of Nevada that this declaration is true and correct. This declaration was signed by me on this 6th day of June 2016 at San Francisco, California.



Kristin L. Martin

CERTIFICATE OF SERVICE

I am employed in the city and county of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action; my business address is: DAVIS, COWELL & BOWE, LLP, 595 Market Street, Suite 800, San Francisco, California 94105.

On this 10th day of June, 2016, I caused to be served a true and correct copy of the above and foregoing:

• **AFFIDAVIT OF KRISTIN L. MARTIN IN SUPPORT OF LOCAL 226'S MOTION FOR SUMMARY JUDGMENT**

via ECF filing, properly addressed to the following:

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*Attorneys for Defendants Victoria Partners d/b/a
MGM Resort and Casino*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 10th day of June, 2016 at San Francisco, California.

/s/ Lesley E. Phillips
Lesley E. Phillips

CERTIFICATE OF SERVICE

AFFIDAVIT OF KRISTIN L. MARTIN IN SUPPORT OF
LOCAL 226's MOTION FOR SUMMARY JUDGMENT

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